

LAW OFFICES
WILLIAMS & CONNOLLY_{LLP}*

LANCE A. WADE
(202) 434-5755
lwade@wc.com

680 MAINE AVENUE SW
WASHINGTON, DC 20024
202.434.5000
WWW.WC.COM

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

March 13, 2025

Via ECF

The Honorable Jeannette A. Vargas
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: SEC v. Nader Al-Naji, et al., No. 24-cv-05738 (JAV)

Dear Judge Vargas:

I represent Defendant Nader Al-Naji in the above-captioned matter. Pursuant to Rule 3.E of Your Individual Rules and Practices in Civil Cases, I write, jointly with Plaintiff, to request a continuance of the deadline for all defendants to answer or move against the Complaint. The current deadline is April 7, 2025, and the parties jointly seek an extension to June 6, 2025. This is the fifth request for an extension. Each prior request was granted.

Previous extension requests were made to facilitate then-ongoing dialogue with the U.S. Attorney's Office for the Southern District of New York ("USAO"). On February 27, 2025, USAO moved to dismiss its criminal complaint against Defendant Nader Al-Naji; and on February 28, 2025, the motion was granted. That dismissal has facilitated more focused discussions between the parties in this action about a potential resolution of this case. These discussions are ongoing. The parties jointly, and respectfully, request a further extension in order to facilitate discussions regarding a potential resolution of this case without the need for further litigation. We correspondingly propose adjourning the initial conference—which the Court reset for April 23, 2025—to some time after June 6, 2025, on a date and time set at the Court's discretion.

Sincerely,

/s/ Christopher J. Carney

Christopher J. Carney
Geoffrey Gettinger (*pro hac vice*)
U.S. Securities & Exchange Commission
100 F Street, N.E.
Washington, DC 20549
Tel: (202) 551-2379

/s/ Lance A. Wade

Lance A. Wade (*pro hac vice*)
Williams & Connolly LLP
650 Fifth Avenue, Suite 1500
New York, NY 10019
Tel: (646) 949-2800
Fax: (646) 949-2801

680 Maine Avenue, SW
Washington, DC 20024
Tel: (202) 434-5755
Fax: (202) 434-5029
lwade@wc.com

cc: All counsel of record (via ECF)